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REMARKS

Claims 1-16 and 21-24 are all the claims presently pending in the application.

Specifically, claims 21-24 stand rejected under §112, second paragraph, on the ground that allegedly the claims are indefinite and fail to particularly point out and distinctly claim the subject matter which the Applicant regards as the invention. However, while the Applicant respectfully disagrees, to speed prosecution the claims have been amended above to clarify for the Examiner that the data storage medium is one "*on which* a computer program *is recorded*". Thus, Applicant submits claims 21-24 are sufficiently definite to set forth the metes and bounds of the invention.

Entry of this §1.116 Amendment is proper. Since the amendments above narrow the issues for appeal and since such features were in the claims earlier, such amendments do not raise a new issue requiring a further search and/or consideration by the Examiner. As such, entry of this Amendment is believed proper and is earnestly solicited.

It is noted that the claims have been amended solely to more particularly point out Applicant's invention for the Examiner, and not for distinguishing over the prior art, narrowing the claim in view of the prior art, or for statutory requirements directed to patentability.

It is further noted that, notwithstanding any claim amendments made herein, Applicant's intent is to encompass equivalents of all claim elements, even if amended herein or later during prosecution.

Attached hereto is a marked-up version of the changes made to the claims by the current amendment. The attached pages are captioned "**Version with markings to show changes made**".

Claims 1-16 and 21-24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Wodarz et al. (U.S. Patent No. 5,999,912) (hereinafter "Wodarz") in view of Agranat et al. (U.S. Patent No. 5,973,696) (hereinafter "Agranat").

These rejections are respectfully traversed in the discussion below.

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I. THE CLAIMED INVENTION

Applicant's invention, as defined for example in the non-limiting embodiment of independent claim 1 (and substantially similarly in independent claims 8 and 13) is directed to a programmable text processing module which loads a document and a parsing editor for initially parsing the document and thereafter incrementally parsing changes committed in the document.

The invention was discussed in detail in the Amendment filed November 1, 2002, and incorporated herein by reference. For convenience, the Examiner is referred thereto.

A feature of the present invention, in a non-limiting embodiment is the automatic (e.g., without user intervention) setting or creation of <u>activemarks which are linked to various commands in response to the parsing performed by the parsing editor</u> (e.g. see page 2, lines 1-5 of the specification and the Abstract).

An exemplary configuration of an edit system incorporating the activemark structure of the present invention is shown in Fig. 1 of the application.

The conventional systems, such as those discussed below and in the Related Art section of the present application, do not have such a structure, and fail to provide for such an operation.

Indeed, such features are clearly not taught or suggested by the cited reference.

II. THE PRIOR ART REJECTION

The Examiner asserts that:

> *[regarding independent claim 1, Wodarz discloses] a mark control module having means for setting a plurality of marks in the document, means for modifying said marks, and means for clearing said marks, and each of said marks comprising selected information in the document and means for linking said selected information with a command, said linking means and said means for setting being responsive to the operation of said parsing editor without user intervention (Wodarz on col. 3, lines 36-61 and col. 4, lines 6-11: teaches modifying (sic) plurality of tags in a HTML*

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> code; each ad is associated with an image information and a
> network link such as URL (linking means); and parsing of
> requested web page is done at server-resident parser without user
> intervention)

However, Applicant respectfully disagrees.

Specifically, Applicant submits that the Examiner's assertions that the present invention is unpatentable over Wodarz in view of Agranat are <u>erroneous</u>.

Firstly, Applicant respectively submits that Wodarz has been misapplied. That is, Wodarz clearly describes that the original prototypes or templates require the inclusion of special *"ad tags"* that *"are used to indicate the characteristics of an ad that can be displayed on a web page at the position of the ad tag"* (e.g., see column 1, lines 39-42 of Wodarz). These ad tags are initially included in the templates and *"an ad will be placed on a viewable web page after the HTML, code defining the web page has been parsed by a client viewing program"* (e.g., see column 2, lines 42-45 of Wodarz).

Once parsed, these ad tags are then "expanded" to reference an advertisement. For example Wodarz discloses *"[w]hen parsed out by a server-resident parser program, the above ad tag would be expanded, for example to the following standard HTML code"* (e.g., see column 3, lines 9-11 of Wodarz). Further, Wodarz discloses *"[u]pon selection of an ad to associate with an ad tag, the parser "expands" the ad tag to standard HTML code that defines the characteristics of the ad (STEP 214). This is done in general by substituting, in place of the ad tag, the link and image information from the database entry for the selected ad. The expanded HTML code is then transmitted to the user"* (e.g., see column 4, lines 6-11 of Wodarz).

Therefore, as disclosed above, Wodarz discloses an arrangement which can only operate if the "ad tags" have been <u>previously</u> inserted or set in the document. Such inserting or setting <u>requires user intervention</u>. That is, unlike the present invention, in Wodarz <u>the user</u> is parsing the marks <u>which already exist in the document</u>.

This is in distinct and fundamental contrast to the claimed present invention where the mark control module <u>sets marks in a document responsive to parsing</u>. Moreover, the setting of marks in the claimed invention is *"<u>without user intervention</u>"*.

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That is, as defined by independent claim 1 (and substantially similarly by independent claims 8 and 13) *"said linking means and said means for setting being responsive to the operation of said parsing editor without user intervention"*. Thus, in the present invention, the linking and setting of activemarks is automatic (e.g., without a user's intervention).

Further, even if Wadarz would have been combined (arguendo) with Agranat, there would still be no teaching or suggestion of the linking means and the setting means *"being responsive to the operation of said parsing editor without user intervention"*.

Thus, turning to the clear language of the claims as defined by independent claim 1 (and substantially similarly by independent claims 8 and 13), Wardaz and Agranat, alone or in combination do not teach or suggest *"[a] processing system for processing a document, said processing system comprising:*

a programmable text processing module having means for loading the document and a parsing editor for initially parsing the document and thereafter incrementally parsing changes committed in said document;

a mark control module having means for setting a plurality of marks in the document, means for modifying said marks, and means for clearing said marks, and each of said marks comprising selected information in the document and means for linking said selected information with a command, said linking means and said means for setting being responsive to the operation of said parsing editor without user intervention;

a graphical user interface module having means for displaying the document and means for controlling the display of the document; and

an edit control module having means for controlling said text processing module, means for controlling said mark control module, and means for controlling said graphical user interface module" (emphasis Applicant's).

Thus, for the reasons stated above, independent claim 1 (and substantialy similarly independent claims 8 and 13) are patentable over Wadarz and Agranat.

Additionally, dependent claims 2-3, 5-7, 9-12, 14-15 and 21-24 when combined with independent claims 1, 8, and 13 respectively, define additional novel and non-obvious features.

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III. FORMAL MATTERS AND CONCLUSION

In view of the foregoing, Applicant submits that claims 1-16 and 21-24, all the claims presently pending in the application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.
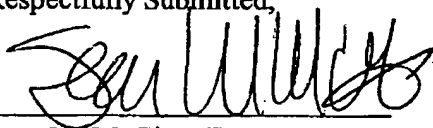
Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a <u>telephonic or personal interview.</u>

The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Assignee's Deposit Account No. 50-0510.
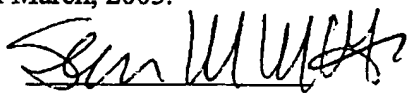
Respectfully Submitted,

Date: 3/17/03

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CERTIFICATION OF FACSIMILE TRANSMISSION

I hereby certify that I am filing this Amendment by facsimile with the United States Patent and Trademark Office to Examiner Romero, Almari Del Carmen, Group Art Unit 2176 at fax number (703) 746-7238 this 17th day of March, 2003.

Sean M. McGinn, Esq.
Reg. No. 34,386

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VERSION WITH MARKINGS TO SHOW CHANGES MADE

IN THE CLAIMS:

The claims have been amended as follows:

21. (Amended) A data storage medium [recorded with] on which a computer program is recorded which, in combination with a general purpose computer loaded with an operating system and a parsing editor, equipped to read into memory and execute program data from the data storage medium to perform the method for generating marks in a document according to claim 13.

22. (Amended) A data storage medium [recorded with] on which a computer program is recorded which, in combination with a general purpose computer loaded with an operating system and a parsing editor, equipped to read into memory and execute program data from the data storage medium to perform the method for generating marks in a document according to claim 14.

23. (Amended) A data storage medium [recorded with] on which a computer program is recorded which, in combination with a general purpose computer loaded with an operating system and a parsing editor, equipped to read into memory and execute program data from the data storage medium to perform the method for generating marks in a document according to claim 15.

24. (Amended) A data storage medium [recorded with] on which a computer program is recorded which, in combination with a general purpose computer loaded with an operating system and a parsing editor, equipped to read into memory and execute program data from the data storage medium to perform the method for generating marks in a document according to claim 16.